

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF
MASSACHUSETTS,

Plaintiff,

vs.

JOSEPH D. GIAMPA, FREDERICK T.
GIAMPA, ADVANCED SPINE CENTERS,
INC., d/b/a FIRST SPINE REHAB, FUTURE
MANAGEMENT CORPORATION, FUTURE
MANAGEMENT BUSINESS TRUST,
EDWARD KENNEDY, BRIAN J.
CULLINEY, D.C. and JENNIFER
McCONNELL, D.C.

Defendants.

Civil Action No. 1:05-cv-11693-RCL

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

Pursuant to Local Rule 7.1(a)(2), I hereby certify that I have conferred with counsel of record, as well as, Attorney Francis A. Gaimari, attorney of record in related pending litigation, Safety Insurance Company v. Joseph D. Giampa, et al, Middlesex Superior Court, C.A. No. 2007-00679, and attempted in good faith to resolve or narrow the issues addressed in Motion to Compel Deposition of Rebecca Morales.

Respectfully submitted,
Encompass Insurance Company,
By its attorneys,

/s/ Nathan A. Tilden

Richard D. King, Jr., BBO#638142
Nathan A. Tilden, BBO#647076
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Dated: May 31, 2007

Certificate of Service

I, Nathan A. Tilden, hereby certify that on this 31st day of May, 2007, this document was filed through the CM/ECF and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

The foregoing documents have also been sent via first-class mail, postage pre-paid direct to:

Francis A. Gaimari, Esquire
Fireman & Associates, LLP
145 Rosemary Street, Suite H-2
Needham, Massachusetts 02494

____/s/ Nathan A. Tilden____